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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE: NATIONAL SECURITY AGENCY TELECOMMUNICATIONS RECORDS LITIGATION This Document Relates To: ALL CASES	MDL NO. 06-1791 VRW **STIPULATION REGARDING PAGE LIMITS FOR BRIEFING VERIZON'S MOTION TO DISMISS PLAINTIFFS' MASTER CONSOLIDATED COMPLAINT** **[Civ. L.R. 7-12]** Judge: Hon. Vaughn R. Walker

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RECITALS

A. On March 19, 2007, various Verizon defendants filed a motion for leave to file a 95-page brief in support of their Motion To Dismiss Plaintiffs' Master Consolidated Complaint ("Motion To Dismiss Master Complaint").

B. On March 21, 2007, the Verizon and MCI Plaintiffs opposed that motion, proposing that Verizon be allowed to file a brief of not more than 40 pages and requesting that they be granted the same number of pages for their opposition to the Motion To Dismiss Master Complaint as Verizon is permitted for the brief in support of the Motion.

C. On March 22, 2007, the moving Verizon defendants filed a reply indicating that they did not object to Plaintiffs receiving the same number of pages for their opposition to the Motion To Dismiss Master Complaint as Verizon is permitted for the brief in support of the Motion.

D. Counsel for the moving Verizon defendants and the Verizon and MCI Plaintiffs have had further discussions regarding Verizon's motion and wish to agree on page limitations without requiring the involvement of the Court.

STIPULATION

Verizon Communications Inc., Verizon Northwest Inc., and MCI Communications Services, Inc. ("Verizon"),[1/] through their counsel, and the Verizon and MCI Plaintiffs, through Interim Class Counsel for the Verizon Class and Interim Class Counsel for the MCI Class, hereby stipulate to the following page limits and ask that the Court make this stipulation an order of the Court:

1. Verizon shall be permitted to file a brief not to exceed 50 pages in support of its Motion To Dismiss Master Complaint.

2. The Verizon and MCI Plaintiffs shall be permitted to file a brief not to exceed 50 pages in opposition to Verizon's Motion To Dismiss Master Complaint.

3. Verizon shall be permitted to file a reply brief not to exceed 30 pages in support of its Motion To Dismiss Master Complaint.

1/ As noted in Verizon's original motion for leave to file a 95-page brief, Verizon Communications Inc., MCI, LLC, and Verizon Global Networks Inc. intend to file a separate motion to dismiss based on lack of personal jurisdiction.

Dated: April 10, 2007

WILMER CUTLER PICKERING HALE AND DORR LLP

By: /s/ John A. Rogovin

John A. Rogovin

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Verizon Northwest Inc., and
MCI Communications Services, Inc.

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By: /s/ Barry R. Himmelstein

Barry R. Himmelstein

Interim Class Counsel for MCI Class

MOTLEY RICE, LLC

By: /s/ Jodi W. Flowers

Jodi W. Flowers

Interim Class Counsel for Verizon Class

Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this document has been obtained from Barry R. Himmelstein and Jodi Flowers.

[PROPOSED] ORDER

Pursuant to the foregoing stipulation, and good cause appearing,

IT IS SO ORDERED

Dated: ______________ ______________________________

Vaughn R. Walker
United States District Chief Judge